

Recommending Class Exemptions for Specified Meter Owners and Small Scale Distributed Generators

Consultation paper

Submissions close: 5pm, 3 September 2019

18 July 2019



Executive summary

The Electricity Authority (Authority) has identified a barrier to emerging technology that is not in the long term interests of the New Zealand consumer, and is providing no benefit.

The Electricity Industry Act 2010 (Act) requires all participants to register with the Authority.

Many everyday consumers are participants because they own their own meter or own distributed generation (mainly solar panels), many without being aware of this. There is an obligation for these participants to register with the Authority. Registration includes providing personal address and contact details which are recorded in a publicly available list on the Authority's website.

However, the Authority considers there are two cases where participant registration is of no benefit to either the Authority or the consumer, yet is costly to administer. The Authority proposes recommending class exemptions to cover two categories of participant from having to register:

- (a) persons, other than a generator (as defined in the Act), who generate electricity that is fed into a network, on a small scale
- (b) metering equipment owners (MEOs) who only own metering equipment measuring electricity at the installation control point (ICP) where they consume electricity.

A common example of the class of participant described in proposal (a) is a residential house owner that installs solar panels on the roof of their house. Approximately 22,500 properties in New Zealand have small scale (10 kW or less nameplate capacity) generation installed, but this number is increasing year on year. The vast majority of small scale generation is rooftop solar, owned by consumers, and their obligations under the Electricity Industry Participation Code 2010 (Code) are performed by the retailer to whom they sell their excess electricity.

Proposal (b) would apply to people or businesses that own the metering equipment only at their property at which they consume electricity. This is common for commercial and industrial ICPs, but the competitive metering market has seen at least one metering equipment provider (MEP) offer MEP services to home owners who want to own their own metering equipment. MEOs have no obligations under the Code.

There are no other obligations on these participants and no use for personal contact information, as we have other ways of contacting these participants if the need ever arises. Enforcing this requirement may act as a disincentive for consumers to take up these new technologies. The Authority proposes to use a class exemption to remove the requirement for these participants to register. This aligns with our statutory objective of promoting efficiency for the long term benefit of the consumer.

As a conservative estimate, if all participants were to register, the Authority would require at least one full-time employee solely to manage registrations, costing approximately \$120,000 per annum.

Contents

Executive summary	ii
1 What you need to know to make a submission	4
What this consultation paper is about	4
How to make a submission	4
When to make a submission	5
2 Issue the Authority would like to address	6
Current obligations for small scale distribution owners	6
Current obligations for MEOs	6
Requirement for registration as a participant	6
What is the purpose of participant registration?	7
The costs of registration outweigh the benefits	7
Prevalence of distributed generation is increasing	8
Registration by all consumers with generation would increase costs for the industry	9
Registration creates a barrier to entry for renewable generation and risks reputational damage	9
The obligation to register may discourage consumers from owning metering equipment	9
The costs and benefits of the status quo are as follows	10
3 Objective	12
The objective is to remove an unnecessary obligation for consumers who own small scale generation or their own metering equipment to register as participants	12
Options for owners of small scale distributed generation	12
Impact analysis for small scale distribution	12
Options for MEOs	13
Impact analysis for MEOs	13
Costs and benefits	14
Analysis of nameplate capacity threshold	14
4 Recommendations	15
Recommendation for small scale distributed generation	15
Recommendation for MEOs	16
5 Implementation	16
6 Monitoring and evaluation	16
Appendix A Format for submissions	17
Glossary of abbreviations and terms	1

Tables

No table of figures entries found.

Figures

Figure 1: Installed distributed generation trends	8
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1 What you need to know to make a submission

What this consultation paper is about

- 1.1 The purpose of this paper is to consult with interested parties on the Authority's proposal to recommend the Minister of Energy and Resources recommends the Governor General make regulations under section 110(1)(a) of the Act. The regulations would exempt the following classes of participant from the obligation to register as an industry participant under section 9(1)(a) of the Act:
- (a) the owners of small scale distributed generation with a nameplate capacity of 100 kW or lower, as long as the owner is not also required to register as another class of participant
 - (b) MEOs who only own metering equipment measuring electricity at the ICP where they consume electricity, as long as the owner is not also required to register as another class of participant.
- 1.2 There is no benefit to the Authority in requiring the participants described in paragraphs 1.1(a) and (b) above to register as participants. Furthermore, the Authority does not consider the cost of managing the register and the unnecessary obligation placed on these participants assists in promoting the long-term benefit of consumers.
- 1.3 The proposed exemptions would reduce barriers to consumers entering the market, reduce privacy concerns, remove disincentives, and keep costs down, which are ultimately recouped through the levy.

How to make a submission

- 1.4 The Authority's preference is to receive submissions in electronic format (Microsoft Word) in the format shown in Appendix A. Submissions in electronic form should be emailed to submissions@ea.govt.nz with "Consultation Paper— Class exemptions from the requirement to register as a participant" in the subject line.
- 1.5 If you cannot send your submission electronically, post one hard copy to either of the addresses below, or fax it to 04 460 8879.

Postal address

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

Physical address

Submissions
Electricity Authority
Level 7, Harbour Tower
2 Hunter Street
Wellington

- 1.6 Please note the Authority wants to publish all submissions it receives. If you consider that we should not publish any part of your submission, please:
- (a) indicate which part should not be published
 - (b) explain why you consider we should not publish that part
 - (c) provide a version of your submission that we can publish (if we agree not to publish your full submission).
- 1.7 If you indicate there is part of your submission that should not be published, we will discuss with you before deciding whether to not publish that part of your submission.

- 1.8 However, please note that all submissions we receive, including any parts that we do not publish, can be requested under the Official Information Act 1982. This means we would be required to release material that we did not publish unless good reason existed under the Official Information Act to withhold it. We would normally consult with you before releasing any material that you said should not be published.

When to make a submission

- 1.9 Please deliver your submissions by **5pm** on Tuesday **3 September 2019**.
- 1.10 The Authority will acknowledge receipt of all submissions electronically. Please contact the Submissions' Administrator if you do not receive electronic acknowledgement of your submission within two business days.

2 Issue the Authority would like to address

Current obligations for small scale distribution owners

- 2.1 Section 7 of the Act defines two classes of participant that generate electricity:
- (a) a generator – a business engaged in generation
 - (b) a person, other than a generator, who generates electricity that is fed into a network.
- 2.2 This section is focused on those described in paragraph 2.1(b), i.e. a person who is not in the business of generation, but who generates electricity that is fed into a network. A common example of this class of participant is a residential house owner that installs solar panels on the roof of the house and exports the excess electricity. Under section 9 of the Act, such participants are required to register with the Authority as participants.
- 2.3 As at 28 February 2019 approximately 22,500 properties in New Zealand have small scale (10 kW or less nameplate capacity) generation installed. The vast majority of small scale generation is rooftop solar, owned by consumers.
- 2.4 Currently, fewer than 200 of the more than 22,000 participants are registered with the Authority as having network-connected generation (of any capacity), all of which are companies, rather than individual consumers.
- 2.5 In addition to the obligation to register as a participant imposed by the Act, the Code contains many obligations for generators, including arranging for appropriate metering and submitting volumes to the reconciliation manager. The vast majority of these small-scale distributed generators discharge their obligations by signing up with their retailer to export electricity. Most, if not all of these participants do not realise they have obligations under the Act or the Code. The Authority notes that this system works well and there are no market issues as a result of retailers performing in this capacity.

Current obligations for MEOs

- 2.6 Section 7 of the Act specifies that MEOs are a class of participant under the Act. Section 5 defines an MEO to be “a person who owns any or all of the items of metering equipment installed in a metering installation”.
- 2.7 In addition to what is commonly referred to as ‘the meter’, metering equipment includes other items often owned by the consumer such as measurement transformers, wiring, circuit breakers, and fuses. Consequently, many consumers are MEOs.
- 2.8 Because MEOs are a class of participant, they are required under section 9(1)(a) to register with the Authority.
- 2.9 MEOs no longer have any obligations under the Code. On 29 August 2013, the Authority amended the Code, imposing obligations on metering equipment providers (MEPs). As part of this amendment all MEO obligations were transferred to MEPs or revoked.

Requirement for registration as a participant

- 2.10 To register, a participant must provide the following details to the Authority:¹
- (a) the name of the participant

¹ Section 27(2) of the Act

- (b) contact details for the participant:
 - (i) physical and postal addresses
 - (ii) telephone and fax numbers
 - (iii) email address
 - (c) the nature of the participant's business (for example, whether it is involved in generation, transmission, distribution, retailing, or a combination of any of these).
- 2.11 The details listed in section 2.10 are added to a publicly available register on the Authority's website.²
- 2.12 Under section 31 of the Act, a participant that fails to register (without an exemption or reasonable excuse) commits an offence and is liable to a fine not exceeding \$20,000. As the value of registration is deemed to be so low, and non-registration is likely to be out of ignorance rather than ill-intent, the Authority considers the possibility of a securing a conviction and fine for failing to register to be essentially nil, and is not seen to be in the long term benefit of consumers.

What is the purpose of participant registration?

- 2.13 The participants register is a centralised contact list for all participants specified in section 7 of the Act.
- 2.14 The Authority uses the contact details stored in the register to communicate with participants for reasons including:
- (a) compliance with the Code including the audit process
 - (b) operational matters, for example sending out guidelines and memos.
- 2.15 Because the participants register is publicly available, it also provides transparency of which businesses are competing in which parts of the electricity industry.
- 2.16 Generally, industry participants are companies therefore the contact details (for example, email address, physical address, phone number) are the company's contact details, not the personal details of the individuals named. However, the majority of the participants we are proposing be exempt are natural persons, not businesses, and therefore the contact details will be personal contact details. This may raise privacy concerns for these people.

The costs of registration outweigh the benefits

- 2.17 Registration of small-scale distributed generators or MEOs has little value. The participants register is intended to hold information on the participants themselves, rather than any technical or descriptive information on their assets or capabilities.
- 2.18 Technical information is not held on the participants register, but is stored on the electricity registry. The registry is a database maintained by the Authority to record information about electrical installations. For small scale distributed generation, it contains information such as generation type and nameplate capacity (in kW). For metering equipment it contains information such as serial numbers, component type, and register content codes.

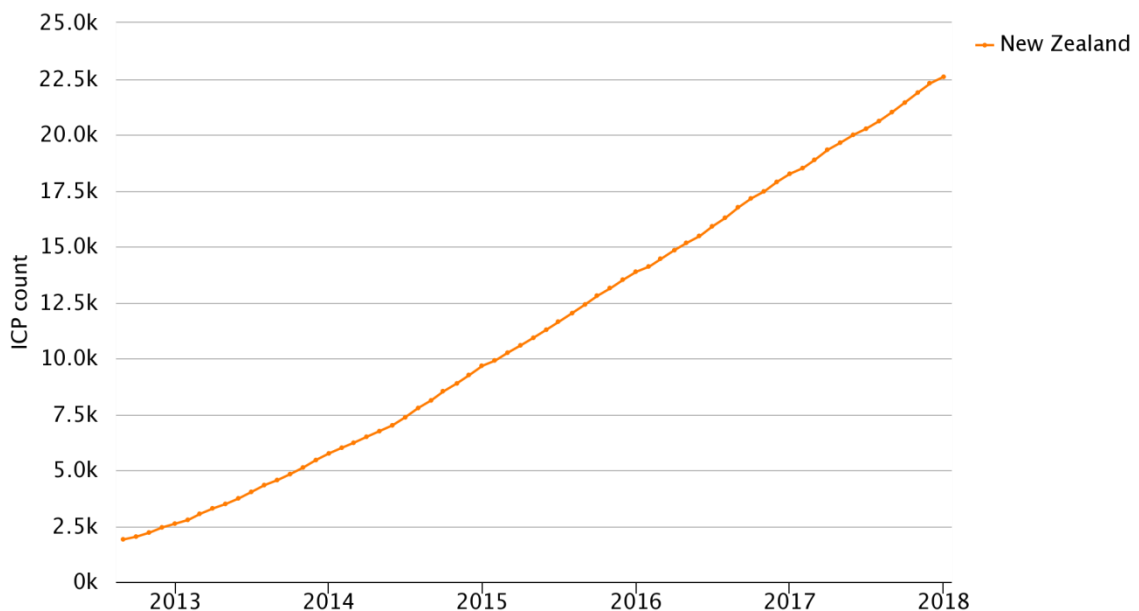
² Section 27(1) of the Act

- 2.19 Technical information about small scale distributed generation is populated in the registry by the distributor. Technical information about metering equipment is populated in the registry by the MEP.
- 2.20 Distributors hold records of distributed generation connected to their network in order to safely operate their network. These records are independent of the participants register, and contain a different subset of technical information about the generation equipment at the electrical installation.
- 2.21 MEPs hold records on the metering equipment owner and the metering equipment the MEP manages. These records are independent of the participants register and contain a different subset of technical information about the metering equipment at the electrical installation.
- 2.22 Regardless of whether they register or not, all participants (as defined in section 7 of the Act) must comply with the Act and the Code. As such, a class exemption from registration would not affect or remove any other obligations on the participants covered by the class exemption.

Prevalence of distributed generation is increasing

- 2.23 As shown in Figure 1 below, the number of installations with 10 kW or less of distributed generation has grown by approximately 4,000 each year. The continuation of this trend would result in more than 50,000 homes in NZ with solar generation by 2026. The owners of these homes would all be required to register with the Authority as participants and provide personal contact information for publication.

Figure 1: Installed distributed generation trends



Registration by all consumers with generation would increase costs for the industry

- 2.24 As at February 2019, the Authority's participants register contains 608 contacts for 309 individual participants. These numbers would be dwarfed by the over 22,500 current connections with small scale distributed generation, which is likely to increase to over 50,000 by 2026.
- 2.25 The participants register is currently administered by an Authority staff member as a minor part of their role. A conservative estimate of the increase in workload is that it would require at least one full-time employee solely to manage registration of participants if all small scale distributed generators were to register, at a total cost of approximately \$120,000. The cost to the Authority would have to be recouped through the levy.

Registration creates a barrier to entry for renewable generation and risks reputational damage

- 2.26 The number of installations with small scale distributed generation far exceeds the number of participants registered as having generation. While this shows that a large number of people who own generation have not registered with the Authority, it is not pragmatic for the Authority to pursue these offences.
- 2.27 It is also likely that the enforcement of registration of participants with small scale distributed generation would be seen as punitive and restricting of consumer choice, as the business models of some participants are based around offering small scale distributed generation to consumers.
- 2.28 The majority of owners of small scale distributed generation are residential consumers. Most of these consumers will be unaware of the requirement to register as they have no market involvement.
- 2.29 Registration as a participant requires these consumers to provide their contact details to be published on the Authority's website. For the vast majority of consumers, this will be their personal contact details which may create privacy concerns for the individuals involved. Reluctance to provide this information for publication represents a barrier to entry, discouraging consumers from installing small scale distributed generation by consumers.
- 2.30 The Authority believes in the case of small scale distributed generators, the value of the information to the industry and the public is minimal (if any) and does not justify publication.
- 2.31 The Code requires all small scale distributed generators to be approved by the distributor, and for the distributor to update the registry with data concerning the presence, fuel type and size of the generation. If the Authority needs to contact small scale distributed generators it can do this through the distributor or directly to the ICP address recorded in the registry.

The obligation to register may discourage consumers from owning metering equipment

- 2.32 Metering equipment is sometimes owned by the consumer. The reasons for this include:
 - (a) for larger electrical installations the metering equipment is integrated within the switchboard or installation at the time of construction

- (b) a perception that owning the metering equipment directly reduces overall costs
 - (c) a perception that owning the metering equipment directly will allow the consumer to choose the metering technology, often when the current retailer is wanting to roll out AMI metering (“smart meters”) but the consumer does not want an AMI meter.
- 2.33 Registration as a participant requires these consumers to provide their contact details to be published on the Authority’s website. For many of these consumers, this will be their personal contact details
- 2.34 The Authority believes in the case of MEOs, the value of the information to the industry and the public is minimal (if any) and does not justify publication.
- 2.35 Publication of personal information could also deter participation, limit new business models, and lead to weak competition. These outcomes would likely result in less efficient outcomes for consumers, especially consumers who already have a distrust of the electricity industry and electricity metering technology.
- 2.36 Continuing to require MEOs to register may also deter large industrial or commercial consumers from taking advantage of new business models that involve customer ownership of metering equipment. An example would be a model where an MEP manages metering for a consumer by providing services like load monitoring, meter reads, and organising maintenance and certification, but the consumer retains ownership of some or all of the metering equipment.
- 2.37 While the MEP could (and in most cases currently does) own some or all of the metering equipment while providing its services, commercial and industrial metering is specialised and expensive equipment, and metering installations may be complex. Separate ownership and provision of metering is allowed by the Act and the Code, and reduces the barriers to entry for providing such services for what is increasingly becoming a data and information focused service.
- 2.38 In many cases with commercial and industrial metering, it is not practical for any other party, apart from the consumer, to own some items of metering equipment. This includes items such as wiring, fuses, and measuring transformers (that are integrated into the switchboard).
- 2.39 Exempting consumers that are MEOs for metering equipment on their own sites from registering as participants would reduce the cost, complexity, and perceived risk of meter ownership.
- 2.40 There are currently no Code obligations for MEOs. All the metering obligations are placed on the MEP. The commercial relationship between the MEO and the MEP means the MEP will have contact information for the MEO. If the Authority needs to contact MEOs for any reason, including informing them of any future Code obligations, this can be done through the MEPs.

The costs and benefits of the status quo are as follows

- 2.41 Costs:
- (a) higher cost: Increased costs to maintain the participants register if consumer level generators and metering equipment owners are registered
 - (b) difficult to enforce: prosecution of owners of small-scale distributed generation and metering equipment owners for failing to register would be unlikely to proceed to

conviction as the Authority considers this would not be in the long term benefit of consumers.

- (c) barrier to participation: if the Authority strictly enforced registration, consumers may be discouraged from installing small-scale distributed generation or owning their own metering equipment.

2.42 Benefits:

- (a) simplicity: anyone that owns or operates generation or metering equipment is required to register as a participant, processing individual exceptions for each participant would be costly and administratively cumbersome.

Q1. Do you agree the issues identified by the Authority are worthy of attention?

3 Objective

The objective is to remove an unnecessary obligation for consumers who own small scale generation or their own metering equipment to register as participants

- 3.1 The obligation for owners of small scale distributed generation or their own metering equipment to register as participants places a regulatory burden on those consumers. Enforcing the obligation would not be for the long-term benefit of consumers, therefore would not support the Authority's statutory objective.
- 3.2 The objective is to remove the obligation to register with the Authority for owners of small scale generation or their own metering equipment, where registration has no net benefit.
- 3.3 The outcome of granting the class exemptions would be that owners of small scale generation or their own metering equipment whose registration has no net benefit, would no longer have an unnecessary obligation to register with the Authority.

Q2. Do you agree with the objective of the proposed exemptions? If not, why not?

Options for owners of small scale distributed generation

- 3.4 The following options have been considered to address the objective for owners of distributed generation, while minimising the risk of any unintended consequences on other regulations or the operation of the market:
 - (a) Option 1 (recommended): grant a class exemption, covering all owners of distributed generation that has a total nameplate capacity of less than 100 kW, from the obligation to register with the Authority as a participant, unless the owner also has to register as another class of participant
 - (b) Option 2: grant a class exemption, covering all owners of distributed generation that has a total nameplate capacity of less than 10 kW, from the obligation to register with the Authority as a participant, unless the owner also has to register as another class of participant
 - (c) Option 3: amend the Act to change the requirements for what information the participants register must hold, or what information must be published. This could be based on a participant's status as a natural person, or their participant class.
- 3.5 The option of doing nothing (the status quo) does not meet the objective so is not included.

Impact analysis for small scale distribution

- 3.6 Options 1 and 2 would achieve the objective. Option 3, depending on how it were implemented, would partially meet the objective.
- 3.7 A class exemption (Options 1 and 2) would remove the obligations for small scale distributed generators to register as participants but would not remove their obligation to comply with the Code.
- 3.8 Option 2 would require owners of small scale distributed generation above 10 kW to register as a participant. Small scale distributed generation between 10 kW and 100 kW is becoming increasingly common as the price point reduces. Analysis of why owners of

distributed generation between 10 kW and 100 kW should be excluded from registration as a participant is below, starting from paragraph 3.22.

- 3.9 Option 3, amending the Act, would require the greatest amount of work to implement. Changing what is currently a simple process where all participants register and the register is published, to another system would add greater complexity than using the existing authority in section 110 of the Act to grant class exemptions from registration. The increased complexity would have a greater risk of unintended consequences, such as participants being misclassified, or having their contact details published in error.
- 3.10 Option 3 also would not achieve the objective in full, as all owners of generation would still be required to register with the Authority. While barriers to entry and concerns relating to privacy would be reduced, the costs of maintaining the participant register would be higher than the status quo.

Options for MEOs

- 3.11 The following options have been considered to address the objective for MEOs, while minimising the risk of any unintended consequences on other regulations or the operation of the market:
- (a) Option 1 (recommended): grant MEOs that only own metering equipment that measures their own consumption a class exemption from the obligation to register with the Authority as a participant, unless they also have to register as another class of participant
 - (b) Option 2: grant all MEOs a class exemption from the obligation to register with the Authority as a participant, unless they also have to register as another class of participant
 - (c) Option 3: amend the Act to remove MEOs as an industry participant “class” in section 7(2)
 - (d) Option 4: amend the Act to change the requirements for what information the participants register must hold, or be published. This could be based on a participant’s status as a natural person, or their participant class.
- 3.12 The option of doing nothing (the status quo) does not meet the objective so is not included.

Impact analysis for MEOs

- 3.13 Options 1, 2 and 3 would achieve the objective. Option 4, depending on how it were implemented, would partially meet the objective.
- 3.14 A class exemption (Options 1 and 2) would remove the obligation for MEOs to register as a participant, and would be easier to implement than amending the Act. Additionally, if the Authority decided to place obligations on MEOs in the future, the class exemption would not remove their obligation to comply with the Code, or the Act. A class exemption would also be easier to revoke, than it would be to amend the Act to reinstate MEOs as a participant.
- 3.15 Option 2 would exempt all MEOs from the obligation to register as a participant. This option would achieve the objective, but it would introduce a risk that a single participant could own a significant number of metering installations as part of its core business and not be required to register.

- 3.16 The Authority is not aware of any participants who own metering for multiple consumers without also being an MEP. While such a hypothetical business would not have any obligations in the Code, the emergence of this business model would be of interest to the Authority for market monitoring purposes to promote its statutory objective.
- 3.17 To preserve the Authority's ability to monitor for such a change, Option 1 proposes to grant a class exemption only to MEOs that own metering that measures their own consumption. This option would still achieve the objective in full, with a slightly restricted scope to avoid any unintended consequences.
- 3.18 Amending the Act to remove the MEOs as an industry participant class (Option 3) would provide more clarity to the industry. It would be clear that MEOs were not considered a participant class in the Act without needing knowledge of an exemption. However it would remove the Authority's ability to regulate MEOs or their activities in the future, as the Code cannot place obligations on non-participants.
- 3.19 Amending the Act to change how participants are registered, or how the register is published (Option 4) is the most risky option presented. Because of the increased complexity of amending how certain participants register or how the Authority publishes the information, there is a risk it could have unintended effects on other participant types, or not be entirely effective at achieving the objective.

Costs and benefits

- 3.20 We have undertaken a qualitative assessment of the expected benefits and costs of the proposals, and compared the proposals against the status quo arrangements. We have undertaken a qualitative CBA because a quantitative CBA is costly and not necessary in this case. We do not anticipate any costs. The benefits of the proposal are as follows:
- 3.21 Benefits:
- (a) slight reduction in the Authority's ongoing administrative costs: reduction in costs related to maintaining the participants register, with maintenance no longer being required on the few participants who have already registered.
 - (b) removal of a barrier to participation: if registration remains mandatory and is strictly enforced, consumers may be discouraged from installing small-scale distributed generation or owning their own metering equipment.
 - (c) lower risk of privacy breaches: due to accidental or malicious activity.

Analysis of nameplate capacity threshold

- 3.22 In the past the Authority has defined small scale distributed generation to be distributed generation with a nameplate capacity of 10 kW or less. Part 6 of the Code differentiates the processes for connecting distributed generation between nameplate capacities of 10 kW or less and greater than 10 kW. Option 2 would align with this existing distinction.
- 3.23 While a threshold of 10 kW would be consistent with Part 6, the reasons supporting that threshold differ from those supporting a class exemption from registration. For example, the connection processes in Part 6 must take into account technical considerations, such as the impact of generation on the network's low voltage network. Such technical considerations are not relevant to registration as a participant, as none of the connection processes in Part 6 are reliant on a participant's registration.
- 3.24 To find a sensible and future-proof generation capacity threshold, which results in the fewest unnecessary registrations, the Authority considered:

- (a) capacity thresholds for generation obligations that already exist in the Code
 - (b) an upper estimate of the total generation a non-commercial distributed generation installation may have in the near future.
- 3.25 Apart from the threshold in Part 6 of the Code discussed in paragraphs 3.22 and 3.23, Part 8 of the Code places obligations on generators relating to ‘common quality’, i.e. to ensure the quality and reliability of supply of electricity.
- 3.26 Clause 8.21(2) places an obligation on generators that have net maximum capacity equal to or greater than 1 MW to provide the system operator with written intention of connection and information relating to its generation. An exemption for generators with a nameplate capacity of 1 MW or greater would have a risk of impacting the monitoring and enforcement of this obligation.
- 3.27 The Authority considered an upper estimate of the total generation an embedded distributed generation installation may have in the near future. Using an upper estimate is important to lower the risk that improvements in technology push the participants the regulation intends to exempt beyond the threshold, which would result in the exemption no longer meeting the objective.
- 3.28 Because a nameplate capacity threshold would be based on the total nameplate capacity of the generation at an installation, multiple types of generation would be summed together to determine if the exemption applied to a participant. Mainstream adoption of new technologies would create a ‘step-change’ in the total generation capacity in many homes.
- 3.29 To account for the uncertain scale of the effect technology will have on distributed generation, the Authority considers a nameplate capacity threshold of 100 kW would be appropriate to ensure an exemption would not quickly become obsolete.
- 3.30 A nameplate capacity threshold of 100 kW (0.1 MW) would align with the minimum contract sizes for ASX futures and Financial Transmission Rights markets. This threshold would also be well below the 1 MW used in clause 8.21(2) of the Code where a participant’s non-registration may impact the Authority’s ability to enforce obligations in the Code.
- 3.31 Ultimately any capacity threshold involves judgements that are difficult to quantify in absolute terms, but the Authority considers 100 kW is a round, simple figure to apply, which is likely to be used in the Authority’s monitoring of generation in the future.

4 Recommendations

Recommendation for small scale distributed generation

- 4.1 The Authority recommends Option 1, to make regulations that exempt all persons, other than generators, who generate electricity that is fed into a network, if:
- (a) the total nameplate capacity of generation they own is less than 100 kW
 - (b) the person is not required to register with the Authority as any other participant class.
- 4.2 The Authority recommends Option 1 because it would:
- (a) achieve the objective in full
 - (b) present the least risk of unintended consequences

- (c) set a threshold high enough to account for technological advances
- (d) provide the most benefit to consumers, be the lowest cost and fastest to implement.

Recommendation for MEOs

4.3 The Authority recommends Option 1, to exempt all MEOs that only own metering equipment that measures their own consumption from the obligation to register as a participant if the MEO is not required to register with the Authority as any other participant class. This option would:

- (a) achieve the objective in full
- (b) present the least risk of unintended consequences
- (c) provide the most benefit to consumers, be the lowest cost and fastest to progress.

5 Implementation

5.1 If regulations are promulgated, the Authority would work with the Ministry of Business, Innovation and Employment to inform the industry of how and to whom they apply.

5.2 Communications to the industry from the Authority would include:

- (a) informing industry via the Authority's weekly newsletter, Market Brief
- (b) updating the Authority website to reflect the exemptions
- (c) ensuring forms and other material are consistent with the exemptions.

6 Monitoring and evaluation

6.1 The Authority, through its work programme, will continue to assess if MEOs should have obligations in the Code.

6.2 If the Authority decides to amend the Code to place obligations on MEOs, the Authority would be likely to recommend to the Minister that the regulation exempting their registration be revoked.

Appendix A Format for submissions

Submitter	
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Question	Comment
Q1. Do you agree the issues identified by the Authority are worthy of attention?	
Q2. Do you agree with the objective of the proposed exemptions? If not, why not?	

Glossary of abbreviations and terms

Authority	Electricity Authority
Act	Electricity Industry Act 2010
Code	Electricity Industry Participation Code 2010